LAW OFFICES OF JORDAN G. ZEITZ BY: JORDAN G. ZEITZ, ESQUIRE

18 West Front Street Media, Pennsylvania 19063 (610) 565-9650 Attorney ID#91771

Attorney for Defendant Ryan Stenwick

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

V. : CRIMINAL NO. 24-407

:

RYAN STENWICK :

DEFENDANT'S UNOPPOSED MOTION TO ENLARGE THE TIME TO FILE PRETRIAL MOTIONS AND FOR CONTINUANCE OF THE TRIAL DATE

RYAN STENWICK, by his attorney, Jordan G. Zeitz, Esquire, respectfully requests that the Court enlarge the time to file pretrial motions and to continue the trial date by one hundred twenty (120) days for the reasons set forth herein:

- 1. On November 7, 2024, a federal grand jury returned the within indictment against Defendant Ryan Stenwick (hereinafter referred to as "Defendant").
- 2. On January 8, 2025, Defendant was formally arraigned on the within indictment.
- On January 14, 2025, the Court entered an ORDER initially setting a trial date of March 3, 2025.
- 4. On February 14, 2025, the Court entered a COMPLEX CASE ORDER.
- 5. On February 19, 2025, the Court entered an ORDER setting a motions date of June 6, 2025 and a trial date of July 15, 2025.

- On March 25, 2025, at the request of the Government, Counsel for Defendant provided the Government with a 2TB external hard drive for the discovery in this matter.
- 7. On May 15, 2025, Counsel for Defendant received from the Government the 2TB external hard drive.
- 8. On May 19, 2025, Counsel for Defendant advised the Government that there were issues accessing the discovery on the 2TB external hard drive.
- 9. On My 21, 2025, the Government confirmed that there were issues with the discovery on the 2TB external hard drive and that it would need to be returned to their office in order to correct the issues.
- 10. On May 28, 2025, Counsel for Defendant provided back to the Government the 2TB external hard drive.
- 11. On June 4, 2025, Counsel for Defendant received back from the Government the 2TB external hard drive.
- 12. On June 5, 2025, A.U.S.A. Carissimi has advised that the Government has no objection to the within motion.
- 13. Counsel for Defendant therefore requests an additional one hundred twenty (120) days to review the discovery, conduct any necessary investigation, file any necessary pre-trial motions, explore the possibility of a non-trial disposition, and prepare the case for trial (if necessary).
- 14. This motion is not filed for purposes of delay but solely that justice is done to ensure Defendant is able to properly present a defense in this matter and to ensure Defendant is afforded the rights guaranteed by the Sixth and Fourteenth Amendments to the United States Constitution.

15. Counsel for Defendant and Defendant agree that the time from July 15,2025 until the next trial listing is excludable pursuant to 18 U.S.C. §3161 etseq.

WHEREFORE, it is respectfully requested that the Court enlarge the time to file pretrial motions and continue the trial date for one hundred twenty (120) days.

Respectfully submitted, LAW OFFICES OF JORDAN G. ZEITZ

BY: JORDAN G. ZEITZ, ESQUIRE Attorney for Defendant Ryan Stenwick

DATE: June 6, 2025

CERTIFICATE OF SERVICE

I, Jordan G. Zeitz, Esquire, hereby certify that I have served electronically a copy of the Defendant's Unopposed Motion to Enlarge the Time to File Pretrial Motions and for a Continuance of the Trial Date upon Assistant United States Attorney Anthony Carissimi, at his office located at 615 Chestnut Street, Suite 1250, Philadelphia, Pennsylvania 19106.

LAW OFFICES OF JORDAN G. ZEITZ

BY: JORDAN G. ZEITZ, ESQUIRE Attorney for Defendant Ryan Stenwick

DATE: June 6, 2025

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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:

RYAN STENWICK

ORDER

AND NOW, this day of , 2025, upon consideration of the Defendant's Unopposed Motion to Enlarge the Time to File Pretrial Motions and for a Continuance of the Trial Date, and that the Government has no objection to Defendant's motion, and that the ends of justice served by granting this motion outweigh the interest of the public and of the defendant in a speedy trial; it is hereby **ORDERED** that the motion is **GRANTED**.

- 1. Trial in this matter shall now begin the day of , 202____.

 with any Pretrial Motions due on the day of , 202____.
- 2. The time from July 15, 2025 until the next trial listing shall be excludable pursuant to 18 U.S.C. §3161(h)(8)(A).

It is so **ORDERED**.

BY THE COURT:

THE HONORABLE GERALD J. PAPPERT United States District Court Judge